

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Amy Scheffler	:	
	:	
Debtor	:	Case No.: 18-14169AMC

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor Confirmed her Chapter 13 Plan with this Honorable Court on January 30th, 2019.
2. Shortly after confirmation of her Plan, the Debtor was in a car accident, where her vehicle was totaled.
3. The Debtor was issued insurance proceeds, which paid off the remaining secured loan on the vehicle owed to Wells Fargo.
4. Debtor is in need of a modified Plan to remove arrears being paid on this secured debt through her Confirmed Plan.
5. The Debtor by and through her Counsel have drafted a proposed modified plan to address this. Please see attached proposed modified plan marked as "**Exhibit A**" and incorporated herein.
6. This modified Chapter 13 Plan is feasible and will allow the Debtor to complete her Chapter 13 Bankruptcy.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above stated reasons.

Dated: February 28, 2019

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor